

Lynda T Bui, Trustee  
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Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, RIVERSIDE DIVISION**

**In re**

**URBAN LOGIC CONSULTANTS, INC.**

**Debtor.**

Case No. 6:19-bk-13367-SY

Chapter 7

**STIPULATION RESOLVING CLAIM OF  
WESTERN RIVERSIDE COUNSEL OF  
GOVERNMENTS/CITY OF BEAUMONT**

**TFR Hearing:**

Date: April 21, 2022

Time: 9:30 a.m.

Place: Courtroom 302  
U.S. Bankruptcy Court  
3420 Twelfth Street  
Riverside, CA 92501

Lynda T. Bui, Chapter 7 Trustee for the bankruptcy estate ("Estate") of Urban Logic Consultants, Inc. ("Debtor") and Western Riverside Counsel of Governments and City of Beaumont (collectively, "WRCOG") hereby enter into and agree to the terms and conditions of this Stipulation based on the following recitals.

**I. RECITALS**

1. The Debtor filed a Voluntary Petition under Chapter 7 of the Bankruptcy Code on April 22, 2019.

1           2.     Lynda T. Bui, is the duly appointed and acting Chapter 7 trustee  
2 (“Trustee”) for the Estate.

3           3.     On November 4, 2019, WRCOG filed its proof of claim (Claim No. 4-1) as  
4 an unsecured claim in an amount to be determined. On November 4, 2019, City of  
5 Beaumont filed its proof of claim (Claim No. 5-1) as an unsecured claim in an amount to  
6 be determined (Claim Nos. 4-1 and 5-1 collectively referred to as the “WRCOG Claim”).  
7 The WRCOG Claim has not been liquidated in state court.

8           4.     On March 1, 2022, the Trustee filed her Final Report (“Final Report”) [Dkt.  
9 No. 114]. The Trustee’s Final Report proposes to pay the WRCOG Claim in the amount  
10 of \$0.0.

11          5.     On March 22, 2022, WRCOG filed an Objection to the Trustee’s Final  
12 Report (“Objection”) [Dkt. No. 121]. In the Objection, WRCOG asserts that the WRCOG  
13 Claim is worth approximately \$67 million.

14          6.     On March 28, 2022, the Trustee filed her Report in Response to the  
15 Court’s Order Approving Stipulation to Extend Response Deadlines Re Trustee’s Final  
16 Report and Creditor Western Riverside Council of Government’s Objection to the  
17 Chapter 7 Trustee’s Final Report (“Response”) [Dkt. No. 123]. In the Response, the  
18 Trustee states that given the small amount of funds available for distribution, it is the  
19 Trustee’s hope to present a proposal to the Court resolving the unliquidated WRCOG  
20 Claim without the need for the Estate to engage counsel to file a detailed response to  
21 the Objection or engage in protracted litigation.

22          7.     In that vein, the Trustee proposed that the WRCOG Claim be allowed in  
23 the amount of \$23,000 as general unsecured. The Trustee also inquired TorCal LLC  
24 (“Torcal”)<sup>1</sup>, the other major creditor in the case, to advise her of its position. TorCal does  
25 not believe that the WRCOG Claim is valid and/or can be in the amount of \$67 million  
26  
27

28 <sup>1</sup> Whose claim has already been resolved and reduced pursuant to Order entered on October 19, 2021  
[Dkt. No. 106]

as suggested by WRCOG in its Objection. TorCal will, however, not object to the stipulated allowed WRCOG Claim in the amount of \$23,000.

8. Given the small amount of funds available for distribution to unsecured creditors, in order to minimize costs and maximize distribution, and given that Torcal, the only other major creditor of the Estate, will not object, the parties have agreed that it is in their best interest to revolve disputes over the WRCOG Claim via this stipulation to avoid the expense of litigating its validity and amount.

## **II. STIPULATION**

**NOW THEREFORE**, in consideration of the foregoing, subject to Court approval, the parties stipulate as follows:

1. Claim No. 4-1 will be allowed in the amount of \$23,000 as a general unsecured claim.

2. Claim No. 5-1 will be allowed in the amount of \$0.0.

**IT IS SO STIPULATED.**

Dated: April 15, 2022

/s/ Lynda T. Bui  
Lynda T. Bui, Chapter 7 Trustee

**BEST BEST & KRIEGER LLP**

Dated: April 15, 2022

Caroline R. Djang  
Caroline R. Djang  
Attorneys for Western Riverside Counsel of  
Governments

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
100 Spectrum Center Drive, Suite 600, Irvine, CA 92618

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION RESOLVING CLAIM OF WESTERN RIVERSIDE COUNSEL OF GOVERNMENTS/CITY OF BEAUMONT** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On April 15, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Lynda T. Bui (TR) trustee.bui@shulmanbastian.com, C115@ecfcbis.com
- Brent S Clemmer garduno@sbemp.com, clemmer@sbemp.com
- Caroline Djang caroline.djang@bbklaw.com,  
laurie.verstegen@bbklaw.com;wilma.escalante@bbklaw.com
- Jenny L Doling JD@jdl.law, dolingjr92080@notify.bestcase.com
- Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- Nicholas A Koffroth nkoffroth@foxrothschild.com, khoang@foxrothschild.com
- Leonard M Shulman lshulman@shulmanbastian.com
- United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On April \_\_, 2022, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

4/15/2022

Lori Gauthier

/s/ Lori Gauthier

Date

Printed Name

Signature